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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Raza Gilani CHAPTER 13 Debtor Shazia Hashmi Co-Debtor PNC BANK, NATIONAL ASSOCIATION NO. 22-11280 AMC Movant VS. Raza Gilani 11 U.S.C. Section 362 Debtor Shazia Hashmi Co-Debtor Scott F. Waterman Trustee

## **CONSENT ORDER**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

- 1. Pursuant to this Consent Order, Both Debtor and Debtor's attorney have agreed to relief from stay regarding the property address 2820 Westerham Road, Downingtown, PA 19335 ("Property) as of July 31, 2023.
- 2. Movant may grant immediate relief from the automatic stay and waiving the stay provided by Bankruptcy Rule 4001(a)(3).
- 3. If the case is converted to Chapter 7, Movant shall file a Certification of Default with the Court and the Court shall enter an order granting Movant relief from the automatic stay.
- 4. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.
- 5. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.
  - 6. The parties agree that a facsimile signature shall be considered an original signature.

Date: August 2, 2023

/s/ Denise Carlon, Esquire
Denise Carlon, Esquire
Attorney for Movant

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Date: 8-9-23	Zachary Perlick Esquire. Attorney for Debtor(s)
8/10/2023 Date:	/s/ Ann E. Swartz, Esq.
	Scott F. Waterman Esquire. Chapter 13 Trustee
Approved by the Court this day of court retains discretion regarding entry of any	
	Bankruptcy Judge Ashely M. Chan